

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

HAPTIC, INC.,

Plaintiff,

v.

APPLE INC.,

Defendant.

Case No. 1:23-cv-1351-DII

JURY TRIAL DEMANDED

DECLARATION OF JOY KETE IN SUPPORT OF DEFENDANT
APPLE INC.'S MOTION TO TRANSFER VENUE

I, Joy Kete, hereby declare:

1. I am an attorney with the law firm Fish & Richardson P.C., and counsel for Defendant Apple Inc. I have personal knowledge of the facts contained in the declaration and, if called upon to do so, I could and would testify competently to the matters herein.

2. Walter Freeman is currently employed by Apple as a Director of Corporate Procurement. Mr. Freeman lives and works in the Northern District of California.

3. Attached to this Motion as Exhibit A is a true and correct copy of U.S. Patent No. 11,416,136 (titled "User interfaces for assigning and responding to user inputs"), which was filed by and currently assigned to Apple Inc.

4. Attached to this Motion as Exhibit B is a true and correct copy of the LinkedIn Profile of Rishabh Y. (www.linkedin.com/in/rishabh-y-6abb40ab), downloaded on January 16, 2024.

5. Attached to this Motion as Exhibit C is a true and correct copy of the LinkedIn Profile of Jamil Dhanani (www.linkedin.com/in/jdhanani), downloaded on January 5, 2024.

6. Attached to this Motion as Exhibit D is a true and correct copy of the LinkedIn Profile of Nicole Yan (www.linkedin.com/in/xynicole), downloaded on January 24, 2024.

7. Attached to this Motion as Exhibit E is a true and correct copy of the LinkedIn Profile of Minwoo Jeong (www.linkedin.com/in/minwoojeong), downloaded on January 24, 2024.

8. Attached to this Motion as Exhibit F is a true and correct copy of Apple Inc.'s Confidentiality Agreement entered into between Apple and Swan Solutions, Inc., effective March 13, 2017.

9. Attached to this Motion as Exhibit G is a true and correct copy of Haptic's Knocki Kickstarter campaign website (www.kickstarter.com/projects/knocki/knocki-make-any-surface-smart), printed on January 5, 2024.

10. Attached to this Motion as Exhibit H is a true and correct copy of an April 8, 2009 article from www.phys.org titled "New iPhone app works by bump, not touch."

11. Attached to this Motion as Exhibit I is a true and correct copy of U.S. Patent No. 8,531,414 (titled "Bump suppression"), issued on September 10, 2013, which was previously assigned to Bump Technologies, Inc. and is currently assigned to Google LLC.

12. Attached to this Motion as Exhibit J is a true and correct copy of the LinkedIn Profile of Kunal Naik (www.linkedin.com/in/kunalpnaik), downloaded on January 16, 2024, an engineer who previously worked on Haptic's Knocki product.

13. Attached to this Motion as Exhibit K is a true and correct copy of TDK InvenSense's website (<https://invensense.tdk.com/company-profile>), printed on January 22, 2024, which shows that TDK InvenSense is headquartered in San Jose, California.

14. Attached to this Motion as Exhibit L is a true and correct copy of Bosch’s website (<https://www.bosch.us/our-company/innovation>), printed on January 22, 2024, which shows that the headquarters for Bosch’s Research and Technology Center North America is in Sunnyvale, CA.

15. Attached to this Motion as Exhibit M is a true and correct copy of the LinkedIn Profile of Ohad Nezer (www.linkedin.com/in/ohadnezer), downloaded on January 5, 2024, one of the named inventors of the Asserted Patent.

16. Attached to this Motion as Exhibit N is a true and correct copy of a map image showing the distance between Cupertino, California and the federal courthouse in San Francisco, California, which is located at 450 Golden Gate Avenue, San Francisco, CA 94102. I am informed and believe that the locations on the map represent the results of Google searches for these locations.

17. Attached to this Motion as Exhibit O is a true and correct copy of a map image showing the distance between Cupertino, California and Austin, Texas. I am informed and believe that the locations on the map represent the results of Google searches for these locations.

18. Attached to this Motion as Exhibit P is a true and correct copy of the bibliographic data of U.S. Patent Application 15/043,283, printed from <https://patentcenter.uspto.gov/applications/15043283> on January 26, 2024.

19. Attached to this Exhibit as Exhibit Q is a true and correct copy of the Western District of Texas’s website (www.txwd.uscourts.gov/court-staff/lee-yeakel), printed on January 5, 2024, showing the existence of a “Vacant Austin District Judge – Docket II” assignment.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 29th day of January, 2024, in San Diego, California.

/s/ Joy B. Kete

Joy B. Kete